

Bingham McCutchen LLP  
DAVID M. BALABANIAN (SBN 37368)  
CHRISTOPHER B. HOCKETT (SBN 121539)  
JOY K. FUYUNO (SBN 193890)  
Three Embarcadero Center  
San Francisco, CA 94111-4067  
Telephone: (415) 393-2000  
Facsimile: (415) 393-2286

Attorneys for Defendant  
Intel Corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MARIA I. PROHIAS, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

INTEL CORPORATION, a Delaware  
corporation,

Defendant.

No. C-05-2699

STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE FILING DATE  
FOR DEFENDANT'S RESPONSE TO  
PLAINTIFF'S COMPLAINT

IT IS STIPULATED BY AND BETWEEN THE PARTIES, THROUGH THEIR  
COUNSEL AS FOLLOWS:

Pursuant to Civil Local Rule 6-2, Plaintiff Maria I. Prohias and Defendant Intel Corporation hereby stipulate that Intel Corporation's response to Plaintiff's complaint shall be due either 60 days after transfer of the above captioned case pursuant to any motion to coordinate or consolidate pre-trial proceedings per 28 U.S.C. Section 1407 or, in the alternative, 45 days after any such motion has been denied. The parties request this transfer because the plaintiffs in *Brauch, et al. v. Intel Corp.*, No. C 05-2743 (BZ) (N.D. Cal., filed July 5, 2005), a related matter,

STIPULATION AND [PROPOSED] ORDER TO CONTINUE RESPONSE DATE

1 have filed a petition to coordinate or consolidate pre-trial proceedings per 28 U.S.C. Section  
2 1407, and the above-styled action has been identified as a related action to that petition. As a  
3 result the outcome of the pending petition will impact significantly the schedule of this case.

4 This is the first stipulation between the parties. Because this litigation has just  
5 begun, granting such a stipulation will not have any negative impact on the schedule of this case.

6 IT IS HEREBY STIPULATED.  
7 DATED: July 17, 2005

8 Bingham McCutchen LLP

9

10

11

By:   
JOY K. FUYUNO  
Attorneys for Defendant  
Intel Corporation

12

13

14

Law Offices of Jeffrey F. Keller

15

16

17

By:   
JEFFREY F. KELLER  
Attorneys for Plaintiff  
Maria I. Prohias

18

19

20

21

22

23

24

25

26